

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IN THE MATTER OF THE SEARCH OF  
FORENSIC IMAGES OF AN IPHONE XS  
WITH IMEI NUMBER 356169098682472 AND  
ICCID NUMBER 89014103271849540586; AN  
IPHONE X WITH IMEI NUMBER  
356719083404157 AND ICCID NUMBER  
89148000001900350389; AND AN IPAD PRO,  
WITH SERIAL NUMBER DLXR2GAKGMLG;  
WHICH IMAGES ARE CURRENTLY  
LOCATED IN THE EASTERN DISTRICT OF  
NEW YORK

PARTIAL UNSEALING  
APPLICATION

Docket No. 19 MJ 765

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IN THE MATTER OF AN APPLICATION FOR  
A SEARCH WARRANT FOR:

Docket No. 19 MJ 806

THE PREMISES KNOWN AND DESCRIBED  
AS  
9 STREAM COURT, GREAT NECK, NEW  
YORK, 11023

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The UNITED STATES OF AMERICA, by Assistant United States Attorney  
Shannon C. Jones, herein applies for an Order authorizing the government to fully disclose  
the search warrants and the applications for the search warrants bearing the above-referenced  
docket numbers to defense counsel for the defendant Tomer Dafna in the matter bearing

criminal docket number 19-408 (MKB), but that the Court only partially unseal the affidavits, bearing the above-referenced docket numbers.

In support of this Application, the UNITED STATES OF AMERICA represents as follows:

1. The search warrants and the applications for the search warrants, which relate to devices and property owned or in the control of defendant Tomer Dafna, were duly authorized by the presiding magistrate judges, who then ordered that the search warrants and the applications for the search warrants be sealed pursuant to the government's request to protect the integrity of an ongoing investigation.

2. Certain targets of the investigation, including Tomer Dafna, have been charged and arrested under criminal docket number 19 CR 408 (MKB). In order to efficiently comply with the government's discovery obligations and to provide for the orderly and speedy reproduction of discovery materials, we seek authorization to furnish copies of the search warrants and the applications for the search warrants to defense counsel for Tomer Dafna.

3. However, the investigation remains ongoing and the government expects that additional arrest may occur in the future. For this reason, the government seeks to keep the documents partially sealed – redacting from public view information about additional targets, as well as redacting non-public confidential information about the investigation.

4. Attached to this application are redacted copies of the relevant applications for the search warrants, which the government respectfully submits strike a balance between informing the public and protecting the integrity of an ongoing

investigation. The government respectfully requests that the above-referenced applications for the search warrants be partially unsealed so that the redacted versions may be published but otherwise remain sealed until further order of this Court.

WHEREFORE, the UNITED STATES OF AMERICA respectfully requests that the Court issue an Order granting this Application.

Dated: Brooklyn, New York  
December 4, 2019

/s/  
Shannon C. Jones  
Assistant U.S. Attorney  
Eastern District of New York

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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NEW YORK

PARTIAL UNSEALING ORDER

Docket No. 19 MJ 765

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IN THE MATTER OF AN APPLICATION FOR  
A SEARCH WARRANT FOR:

THE PREMISES KNOWN AND DESCRIBED  
AS  
9 STREAM COURT, GREAT NECK, NEW  
YORK, 11023

Docket No. 19 MJ 806

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EASTERN DISTRICT OF NEW YORK, SS:

Application having been made on behalf of the UNITED STATES OF  
AMERICA, by Assistant United States Attorney Shannon C. Jones, for an Order authorizing  
the government to fully disclose the search warrants and the applications for the search  
warrants bearing the above-referenced docket numbers to defense counsel for Tomer Dafna  
in the matter bearing criminal docket number 19-408 (MKB), and full consideration having  
been given to the matters set forth therein,

IT IS HEREBY ORDERED that the government may furnish copies of the search warrants and the applications for the search warrants bearing the above-referenced docket numbers to defense counsel for Tomer Dafna in the matter bearing criminal docket number 19-408 (MKB).

IT IS FURTHER ORDERED that the above-referenced applications for the search warrants be partially unsealed and that the redacted versions be published on the respective dockets but that the above-referenced applications for the search warrants otherwise remain sealed until further order of this Court..

Dated: Brooklyn, New York  
December 4, 2019

A handwritten signature in black ink, appearing to read 'REYES', is positioned above a horizontal line.

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THE HONORABLE RAMON E. REYES, JR.  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK